

EXHIBIT C

Chang, Haeji

To: Riccardulli, Stephen
Subject: RE: RE: MTBE - Commonwealth of Puerto Rico

>>> Alejandro J. Cepeda Diaz 8/24/2013 11:43 AM >>>
Mr. Boone,

I understand from your email that the Commonwealth intentionally failed to provide notice. I fail to see which Rule of Federal Procedure allows you to perform discovery of persons associated with a defendant without any prior notice to other parties in the case and particularly the affected defendant. We have also learned that you served a subpoena on Ms. Brenda Torano, a former Sol employee and current employee of PC Puerto Rico, which I believe is also a defendant. We request that you also withdraw the subpoena to Ms. Torano. We further request that you immediately inform us of any other subpoenas you chose to serve without notice to any other parties.

>>> "Daniel Boone" <dboone@toxic torts.org> 8/23/2013 5:46 PM >>>

Dear Mr. Cepeda,

Ms. O'Reilly may have additional comments in response to your letter. For my part, I point out that FRCP Rule 45(b) requires service of a notice on all parties only if the subpoena commands production of documents, electronically stored information or tangible things, or the inspection of premises. The subpoena did not command any of these things, so notice on all parties was not required. Thank you.

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From: Alejandro J. Cepeda Diaz [<mailto:Ajc@mcvpr.com>]
Sent: Friday, August 23, 2013 1:19 PM
To: dboone@toxic torts.org; toreilly@toxic torts.org
Cc: Jorge J. García-Díaz; Juan A. Marques <Jam@mcvpr.com>
Subject: MTBE - Commonwealth of Puerto Rico

Please refer to the attached letters.



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